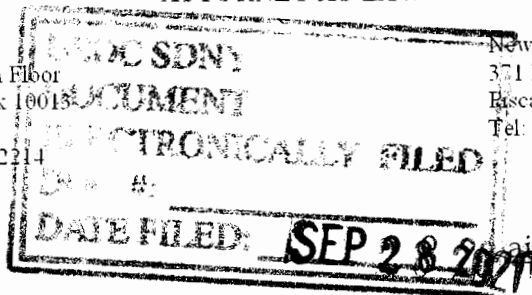


Law Office of Aihong You
ATTORNEY AT LAW

New York Office
99 Hudson Street, 5th Floor
New York, New York 10013
Tel: (917) 412-3603
Firm Fax: (732) 909-2214

New Jersey Office
371 Hoes Lane, Suite 200
Bascataway, New Jersey 08854
Tel: (732) 532-8862



Aihong You, Esq.
aihong.you@aihonglaw.com

November 27, 2021

Hon. George B. Daniels
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Re: Yan v. Renew Body Wellness, Inc et al. (1:20-cv-09401-GBD)
Letter motion to extend discovery deadline

SEP 28 2021

Dear Judge Daniels:

I represent the plaintiff in the above-captioned matter. This action was filed on November 12, 2020. The parties have consented to a case management order on May 18, 2021. By said order, the discovery should be completed on September 28, 2021. On or about May 13, 2021, plaintiff made disclosure and produced all documents in his possession relating to this matter. As of today, defendant has not produced any documents, including any pay and employment records of the plaintiff. On or about May 13, 2021, I sent the plaintiff's discovery demands to defendant. Over the past several months, I have sent at least three emails requesting their production and responses immediately. As of today, no response was received.

On September 20, 2021, upon my request, I had phone conference with defendant's counsel regarding discovery. Defendant's counsel requested to extend discovery deadline and promised to produce responses within a week. As of today, I have not received anything yet. With this letter, I respectfully request the Court to extend the discovery deadlines for three months, which give the plaintiff the time to review documents and take depositions. In addition, the plaintiff respectfully requests the other deadlines be extended accordingly. The plaintiff proposes the following deadlines for this matter:

No additional parties may be joined after December 15, 2021;

No amendment to the pleadings will be permitted after December 15, 2021;



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Piscataway, New Jersey 08854
Tel: (732) 532-8862

The defendant should produce their discovery responses on or before October 15, 2021;
The parties' depositions should be completed on or before November 15, 2021.
Dispositive motion should be served by January 15, 2022.
A joint pretrial order shall be filed no later than February 15, 2022.
The party should be ready for trial within 48 hours, notice on March 15, 2022.

The defendant consents to the above-proposed scheduling. We are available at the Court's convenience if the Court has any questions. I thank you for Your Honor's attention to this matter.

Respectfully yours,

Aihong You, Esq.